

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Philip A Kelsch	:	Chapter 13
Melanie Kelsch	:	Case No.: 25-10822-AMC
Debtors.	:	

MOTION TO EXPEDITE MOTION TO APPROVE NEW DEBT

Philip A Kelsch and Melanie Kelsch (the “Debtors”), by and through their undersigned counsel, hereby submits this Motion to Expedite the Debtors’ Motion to Approve New Debt (the “Motion”), and in support thereof respectfully states the following:

1. The Debtors filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code on February 28, 2025.
2. On May 28, 2025, the Debtors filed a Motion to Approve New Debt.
3. The Debtors require an Order from the Court to obtain financing to purchase a new vehicle.
4. Under the Court’s standard schedule, the Motion to Approve New Debt would not be heard until July 2, 2025, but waiting until that date could cause the Debtors to lose their opportunity to obtain financing to purchase a new vehicle.
5. Neither the chapter 13 trustee nor the Debtors’ creditors will be prejudiced by the granting of an expedited hearing.

WHEREFORE, the Debtors respectfully requests this Honorable Court enter an Order granting an expedited hearing, and for such other and further relief the Court deems just and appropriate.

Respectfully submitted,

Dated: May 28, 2025

/s/ Brad J. Sadek

Brad J. Sadek, Esquire
Sadek Law Offices, LLC
1500 JFK Boulevard, Suite #220
Philadelphia, PA 19102
brad@sadeklaw.com
215-545-0008